U.S. Department
of Transportation
**Federal Aviation
Administration**

Office of the Chief Counsel

**800 Independence Ave., S.W.
Washington, D.C. 20591**

MAR 2 1 2016

Mr. John Rusinko
[redacted]

Re: Small Unmanned Aircraft Registration - 14 C.F.R. Parts 47 and 48

Dear Mr. Rusinko:

This letter is provided in response to your letter dated December 17, 2015 to the Federal Aviation Administration (FAA) Office of the Chief Counsel seeking a legal interpretation. In your request for a legal interpretation you ask whether you must register model aircraft that you do not anticipate operating for two to three years.[1]

A small unmanned aircraft owner need only register aircraft operated in the national airspace system (NAS). *See* 14 C.F.R. §§ 47.3(b) and 48.15. Thus, you need not immediately register those small unmanned aircraft that you do not anticipate flying for two to three years. As long as you complete the registration process provided by either, 14 C.F.R. part 47 or 14 C.F.R. part 48 prior to operation of your small unmanned aircraft in the NAS, you will be in compliance with aircraft registration requirements. *See* 14 C.F.R. §§ 47.3(b), 48.5(a) and 48.15.

This response was prepared by Sara Mikolop, an attorney in the Regulations Division of the Office of the Chief Counsel, and was coordinated with the Civil Aviation Registry Division (AFS-700) and the UAS Integration Office. If you need further assistance, please contact our office at (202) 267-3073.

Sincerely,

Lorelei Peter
Assistant Chief Counsel for Regulations

[1] For purposes of this legal interpretation, we assume that when your letter refers to model aircraft that are "larger models" that those model aircraft are small unmanned aircraft (less than 55 lbs.).

John Rusinko
[redacted]
[redacted]
December 17, 2015

Office of the Chief Counsel
800 independence Ave, SW.
Washington, DC 20591

Re: Interpretation of 14 CFR 48.5 "Compliance Dates" in PART 48 –REGISTRATION AND MARKING REQUIREMENTS FOR SMALL UNMANNED AIRCRAFT

In Title 14 CFR, 48.5 "Compliance Dates" it states:

> *"14 CFR 48.5 (a) Small unmanned aircraft used exclusively as model aircraft. For small unmanned aircraft operated by the current owner prior to December 21, 2015, compliance with the requirements of this part or part 47 is required no later than February 19, 2016. For all other small unmanned aircraft, compliance with this part is required prior to operation of the small unmanned aircraft.".*

I have several model aircraft that are over 0.55 lbs. and have been flown before December 21, 2015, some as recently as this past summer; however I am not currently flying them. Time and money prevent me from enjoying those larger models. I have been mostly flying micro models, and mostly indoors recently. Most of the micro models are well under 0.55 lbs., and I don't intend on registering them, as it is not required. My question and concern are for my larger models, will I be required to register the larger models, even if I don't foresee flying them in the near future? I do hope to fly them again, just probably not for the next two to three years.

Respectfully,
John Rusinko